

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

Court File No. 17-cv-136 (RHK/FLN)

KLEINBANK,

Defendant.

---

**DEFENDANT'S MOTION TO DISMISS**

---

KleinBank respectfully moves the Court for an Order dismissing the Complaint under Federal Rule of Civil Procedure 12(b)(6).

This motion is supported by the accompanying memorandum of law, declaration of John W. Lundquist, and exhibits; counsel's arguments at the hearing; and all of the other files, records, and proceedings herein.

Dated: June 5, 2017

s/ John W. Lundquist

---

John W. Lundquist (#0065286)

Amber J. Moren (#0394976)

Anupama D. Sreekanth (#0393417)

**FREDRIKSON & BYRON, P.A.**

200 South Sixth Street, Suite 4000

Minneapolis, MN 55402-1425

Telephone: 612.492.7000

jlundquist@fredlaw.com

amoren@fredlaw.com

asreenkanth@fredlaw.com

*Attorneys for Defendant KleinBank*